

**IN THE UNITED STATES DISTRICT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT, )  
                        )  
Plaintiff,           )  
                        )  
v.                    )      Docket No.: 23-CV-00243  
                        )  
SOUTHERN BAPTIST CONVENTION, *et al.*, )      JURY DEMAND  
                        )  
Defendants.         )  

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**DEFENDANT SOUTHERN BAPTIST CONVENTION'S  
MOTION FOR SUMMARY JUDGMENT**

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The Defendant, Southern Baptist Convention ("SBC" and/or "Defendant"), by and through counsel, pursuant to Fed. R. Civ. P. 56, moves the Court for summary judgment in its favor on all of Plaintiff's claims (the "Motion"). As set forth more fully below, the undisputed facts reveal that Plaintiff cannot establish sufficient evidence to establish any liability against the SBC for including defamation, false light invasion of privacy, intentional and negligent infliction of emotional distress, and public disclosure of embarrassing facts. The SBC is entitled to summary judgment on each of these claims because there is no evidence that the SBC acted with either actual malice or negligence in connection with the issuance of the Guidepost Report. In addition, there is no evidence that Plaintiff has suffered serious mental injury (as required to prove his emotional distress claims), nor that the matters discussed in the Guidepost Report are not matters of legitimate public concern (as required for his public disclosure of embarrassing facts claim).

In addition, to the extent that Plaintiff asserts liability against the SBC on the basis of (1) a February 1, 2023 letter from the Credentials Committee of the SBC ("Credentials Committee") to a cooperating Southern Baptist church (the "Credential Committee Letter") and (2) a December 5,

2022 tweet by then-President of the SBC, Bart Barber (the “Barber Tweet”), the SBC is also entitled to summary judgment. As for claims arising from the Credentials Committee Letter, the ecclesiastical abstention doctrine prohibits this Court from adjudicating any issues related to its contents. In the alternative, the statements contained in the Credential Committee Letter were not published by the SBC and the statements themselves are true. As for claims arising from the Barber Tweet, the SBC did not author nor publish the Barber Tweet.

As set forth in greater detail in the accompanying Statement of Undisputed Material Facts and Memorandum of Law in Support of this Motion, there are no material facts in dispute and no genuine issue for trial such that the SBC is entitled to summary judgment in its favor as to all claims asserted by Plaintiff with prejudice as a matter of law.

**DATED: July 3, 2024.**

Respectfully submitted,

**TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC**

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and complete copy of the foregoing has been served through the Court's electronic filing system to the following on **July 3, 2024**:

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